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Attorney for Defendant  
RYAN WELCH

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN WELCH,

Defendant.

2:23-CR-00123-JDP

STIPULATION AND ~~[PROPOSED]~~ ORDER  
TO CONTINUE CHANGE OF PLEA  
HEARING

DATE: August 22, 2023

TIME: 2:00 p.m.

JUDGE: Hon. Jeremy D. Peterson

IT IS HEREBY STIPULATED BETWEEN the parties by and through their counsel of  
record, as follows:

1. By previous order, this matter was scheduled for a change of plea hearing on  
August 22, 2023 at 2:00 p.m.

2. By this stipulation, the parties now jointly move to vacate this date and  
set the change of plea hearing on October 2, 2023 at 10:00 a.m.

3. Counsel for the defendant believes that failure to grant the above requested  
continuance would deny them the reasonable time necessary for effective preparation, taking into  
account the exercise of due diligence and the current trial schedule of defense counsel. Counsel  
for the defendant also believes that failure to grant the above-requested continuance would deny  
the defendant continuity of counsel.

STIPULATION AND ~~[PROPOSED]~~ ORDER TO CHANGE OF PLEA HEARING

UNITED STATES V. RYAN WELCH

[2:23-CR-0123 JDP]

4. The government does not object to and joins in the request for a continuance.

5. Based on the above, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

6. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 11, 2023, to August 22, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at the defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

7. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED:

DATED: AUGUST 18, 2023

/s/ David W. Dratman  
DAVID W. DRATMAN  
Attorney for Defendant  
RYAN WELCH

DATED: AUGUST 18, 2023

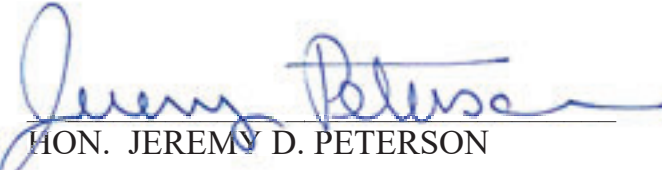
PHILLIP A. TALBERT  
United States Attorney

By: /s/ Heiko P. Coppola\*  
HEIKO P. COPPOLA  
Assistant U.S. Attorney  
\*Signed with permission

ORDER

IT IS SO ORDERED.

DATED: August 18, 2023

  
HON. JEREMY D. PETERSON  
United States Magistrate Judge